

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

NICKOLAS HICKTON, *et al.*,

Plaintiffs,

v.

ENTERPRISE RENT-A-CAR
COMPANY, *et al.*,

Defendants.

Nos. 2:09-mc-00210-JFC
 2:07-cv-01687
 2:09-cv-00815
 2:09-cv-00816
 2:09-cv-00824
 2:09-cv-00832
 2:09-cv-00833
 2:09-cv-01188
 2:09-cv-01321
 2:10-cv-01003
 2:10-cv-01189
 2:10-cv-01456
 2:11-cv-00071
 2:11-cv-00333
 2:11-cv-01024
 2:12-cv-00659

Judge Joy Flowers Conti

THIS DOCUMENT RELATES TO:

Electronically Filed

All Actions

**JOINT MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASSES, AND APPROVAL
OF SETTLEMENT NOTICES**

Plaintiffs in the above-captioned actions and the Enterprise Groups¹ (collectively, the “Settling Parties”) respectfully submit this Joint Motion for Preliminary Approval of Settlement, Certification of Settlement Classes, and Approval of Settlement Notices (“Joint Motion”) and move for an order: (1) approving the Settlement Agreement; (2) certifying the classes described in the Settlement Agreement; and (3) approving issuance of the notices and ancillary documents annexed to the Settlement Agreement. In support thereof, the parties have contemporaneously filed a Memorandum of Law and the Declaration of Peter A. Muhic (with exhibits thereto). A [Proposed] Preliminary Order is attached for the Court’s convenience. The Enterprise Groups agree, for purposes of settlement only, not to oppose entry of the proposed order.

For the reasons set forth in the attached memorandum of law, the Settling Parties respectfully request that the Court grant this Joint Motion and enter the accompanying proposed order.

Dated: April 12, 2013

Respectfully submitted,

/s/ Peter A. Muhic

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¹ The Enterprise Groups include the following named Defendants in the above-captioned actions: Enterprise Rent-A-Car Company of Pittsburgh LLC; ELRAC, LLC; Enterprise Leasing Company-South Central, LLC; Enterprise Leasing Company of Florida, LLC; Enterprise Leasing Company of Chicago, LLC; Enterprise Leasing Company of Georgia, LLC; Enterprise Rent-A-Car Company-Midwest, LLC; Enterprise Leasing Company of Orlando, LLC; Enterprise Leasing Company of Philadelphia, LLC; Enterprise Leasing Company-Southeast, LLC; EAN Holdings LLC; Enterprise RAC Company of Maryland, LLC; Enterprise Leasing Company-West, LLC; Enterprise Leasing Company of Phoenix, LLC; Enterprise Leasing Co. of Norfolk/Richmond, LLC; and Enterprise Leasing Company of Tennessee. The Enterprise Groups also include any other operating subsidiaries of Enterprise Holdings, Inc., that voluntarily decide to participate in the Proposed Settlement Agreement.

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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of April, 2013, pursuant to Local Rule 5.5 of the United States District Court for the Western District of Pennsylvania, I caused the foregoing to be served by electronic means through the Court's transmission facilities upon all counsel of record.

/s/ Peter A. Muhic
Peter A. Muhic